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Attorney for Plaintiff

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Attorneys for Defendant

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

TERENCE A. HARVEY,

Plaintiff

v.

CAROLYN W. COLVIN, Acting  
Commissioner of Social Security,

Defendant.

) Case No: 2:14-cv-01742-JAD-CWH

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**JOINT STIPULATION FOR EXTENSION  
OF TIME TO FILE DEFENDANT'S  
CROSS-MOTION TO AFFIRM**

**(First Request)**

The parties jointly request to extend the time by thirty days from June 28, 2015 to July 28, 2015 for Defendant Carolyn W. Colvin, Acting Commissioner of Social Security, to file her

1 Cross-Motion To Affirm, with all other dates in this Court's Order Concerning Review Of Social  
2 Security Case extended accordingly. This is the Commissioner's first request for an extension.

3 There is good cause for this extension because the Commissioner's counsel is handling a  
4 large number of other District Court cases. Further, counsel is preparing for a hearing in an  
5 administrative employment matter, which is set to occur in two weeks. Counsel has also been  
6 out of the office on official travel and will be traveling intermittently over the next several  
7 weeks. The Commissioner needs additional time to respond to the issues Plaintiff raised in his  
8 Motion For Reversal And/Or Remand. Plaintiff has no objection.

9  
10 Respectfully submitted,

11 Date: June 24, 2015

12 By: /s/\* Marc V. Kalagian  
13 MARC V. KALAGIAN  
\*by email authorization on 6/24/15

14 Attorneys for Plaintiff

15 Date: June 24, 2015

DANIEL G. BOGDEN  
United States Attorney  
BLAINE T. WELSH  
Civil Division Chief

17 By: /s/ April Alongi  
18 APRIL ALONGI  
19 Assistant Regional Counsel  
Social Security Administration

20 Attorneys for Defendant

21  
22 IT IS SO ORDERED.

23  
24 DATE: June 25, 2015

25   
26 THE HONORABLE C.W. HOFFMAN, JR.  
United States Magistrate Judge

**DEFENDANT'S CERTIFICATE OF SERVICE**

I certify that I caused a copy of the Joint Stipulation For Extension Of Time To File Defendant's Cross-Motion To Affirm (First Request) to be served, via CM/ECF notification, on:

MARC V. KALAGIAN  
Law Offices of Rohlfing & Kalagian, LLP  
211 East Ocean Boulevard, Suite 420  
Long Beach, California 90802

Date: June 24, 2015

DANIEL G. BOGDEN  
United States Attorney  
BLAINE T. WELSH  
Civil Division Chief

By: /s/ April Alongi  
APRIL ALONGI  
Assistant Regional Counsel  
Social Security Administration

Attorneys for Defendant